

Exhibit A

Matter 16 - Asset Analysis and Recovery - Fees

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/01/01	Samuel A Schwartz	1.80	Review and analyze various issues re assets and DIP Agreement provisions related thereto (.8); telephone conferences with the client re same (.8); revise Coupons Motion (.1); draft correspondence re same (.1).
11/02/01	Samuel A Schwartz	1.40	Telephone conferences with the client re various asset issues and DIP matters related thereto (1.1); review correspondence re same (.3).
11/02/01	Janet Baer	0.80	Telephone conference with clients re coupon motion issues.
11/05/01	Samuel A Schwartz	0.90	Telephone conferences with the client re various asset related matters.
11/06/01	James W Kapp	0.10	Attend to issues re clarification of customer program motion.
11/06/01	Samuel A Schwartz	0.90	Telephone conferences with the client and various professionals re asset related matters, acquisitions and DIP provisions related thereto.
11/06/01	Janet Baer	0.50	Telephone conference with R. Beber (.3); revise Coupon motion to reflect comments (.2).
11/07/01	James W Kapp	0.50	Review and revise order clarifying customer programs (.3); attend to issues re same (.2).
11/07/01	Janet Baer	0.40	Conference with R. Beber re final comments to coupon motion (.1); revise same (.3).
11/08/01	James W Kapp	0.50	Address issues re potential acquisition.
11/08/01	Samuel A Schwartz	1.10	Telephone conferences with the client re various proposed transactions (.3) draft correspondence re same (.8).
11/08/01	Janet Baer	0.30	Telephone conferences re Coupon motion (.2); revise same (.1).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/09/01	James W Kapp	0.20	Address issues re potential asset acquisition.
11/09/01	Samuel A Schwartz	0.80	Telephone conferences with the client re various asset related matters (.2); draft correspondence re same (.6).
11/12/01	Samuel A Schwartz	0.40	Telephone conferences with the client re various asset related matters.
11/14/01	Samuel A Schwartz	0.20	Attend to matters re the filing of the customer programs motion.
11/16/01	James W Kapp	0.40	Address issues re potential acquisition of assets.
11/27/01	Samuel A Schwartz	0.40	Telephone conferences with the client re various asset related matters.
11/28/01	Samuel A Schwartz	0.70	Telephone conferences with the client re various asset related matters.
11/29/01	Samuel A Schwartz	1.80	Telephone conferences with the client re surety bonds, letters of credit and settlement agreements (1.5); attend to matters re same (.3).

Matter 17 - Automatic Stay Matters/Relief from Stay Proceedings - Fees

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/08/01	Scott A McMillin	1.00	Review Kane motion for relief from stay and analyze responsive arguments.
11/08/01	Janet Baer	0.30	Telephone conference with various parties re Kane lift stay.
11/09/01	Scott A McMillin	3.00	Draft opposition to Kane stay relief motion.
11/11/01	Janet Baer	0.30	Review and revise Kane stay relief motion.
11/13/01	Janet Baer	0.50	Review revised response to Kane stay relief motion.
11/28/01	J Chad Mitchell	5.30	Research re automatic stay and police power exception versus environmental claims.

Matter 20 - Case Administration - Fees

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/01/01	Brigitte F Windley	0.70	Review various case documents and assign central file categories.
11/01/01	Sabrina M Mitchell	0.20	Retrieve and duplicate consulting agreements from central files (.1); search the online docket for the American Real Estate complaints (.1).
11/01/01	Sabrina M Mitchell	1.80	Update the case file index with new documents and prepare for inclusion into central files (.3); identify new pleadings using the court's website and include in the central file docket binders (1.3); review the online docket and update the motion status chart (.2).
11/02/01	James W Kapp	0.30	Review pleadings and correspondence and attend to issues re same.
11/02/01	Shirley A Pope	3.10	Prepare binders re Fresenius and Sealed Air and other materials re document review.
11/02/01	Brigitte F Windley	2.30	Review new adversary pleadings for central filing (.6); review various case documents and assign central file category (.9); review online docket to identify pleadings PACER numbers (.8).
11/02/01	Janet Baer	0.40	Attend to matters re various outstanding matters.
11/02/01	Sabrina M Mitchell	2.60	Update the case file index with new documents and prepare for inclusion into central files (.7); identify new pleadings using the court's website and include in the central file docket binders (1.9).
11/02/01	Benjamin J Alke	1.20	Update case file re new pleadings (.8); update document production index re new work product (.4).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/02/01	Marguerite M Melvin	4.70	Prepare and update list of key professionals in the asbestos-related bankruptcy cases (.8); review dockets (1.0); review dockets and obtain recently filed pleadings of interest (2.0); update pleadings indices (.5); prepare subfolders for new pleadings (.2); incorporate pleadings into asbestos case files (.2)
11/04/01	Samuel A Schwartz	0.60	Review docket (.3); review various contested matters (.3).
11/05/01	Shirley A Pope	1.00	Prepare documents for attorney review (.5); update correspondence files (.5).
11/05/01	Sabrina M Mitchell	2.70	Review the online docket and update the motion status chart (.5); update the case file index with new documents and prepare for inclusion into central files (.7); identify new pleadings using the court's website and include in the central file docket binders (1.5).
11/05/01	Benjamin J Alke	4.10	Organize Grace's document production re Fresenius and Sealed Air in preparation for attorney review (2.0); prepare copies of selected documents for attorney review (1.5); prepare copies of the Abner and Woodward complaints for attorney review (.6).
11/06/01	James W Kapp	0.80	Review docket and attend to issues re same (.2); review various pleadings and correspondence and attend to issues re same (.5); review status motion chart (.1).
11/06/01	Brigitte F Windley	0.30	Update motion status chart.
11/06/01	Sabrina M Mitchell	3.60	Update the case file index with new documents and prepare for inclusion into central files (.7); identify new pleadings using the court's website and include in the central file docket binders (2.9).
11/06/01	Sabrina M Mitchell	2.10	Retrieve and duplicate requested documents and prepare transmittal of the same.
11/06/01	Marguerite M Melvin	0.40	Duplicate and distribute articles for attorneys review.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/07/01	David M Bernick, P.C.	1.50	Prepare and attend team meeting. team meeting.
11/07/01	James W Kapp	1.30	Review various pleadings and correspondence and attend to issues re same (.2); participate in status conference and prepare for same(1.1).
11/07/01	James W Kapp	0.10	Review and revise status motion chart and attend to issues re same.
11/07/01	Shirley A Pope	1.00	Prepare and attend team meeting.
11/07/01	Christopher B Sullivan	1.50	Prepare for and attend team meeting.
11/07/01	Kellye L Fabian	1.00	Prepare for and attend team meeting.
11/07/01	Deanna D Boll	1.00	Prepare for and participate in team meeting.
11/07/01	Janet Baer	1.20	Prepare for and attend team meeting.
11/07/01	Sabrina M Mitchell	1.20	Download certain pleadings from the W. R. Grace online docket (.1); identify new pleadings using the court's website and include in the central file docket binders (1.1).
11/08/01	James W Kapp	0.20	Review pleadings and correspondence (.1); attend to issues re same (.1).
11/08/01	Roger J Higgins	0.30	Review motion status chart (.1); attend to matters re same (.2).
11/08/01	Sabrina M Mitchell	3.10	Review the online docket and update the motion status chart (.8); create an adversary proceedings binder and include all new pleadings (.7); update the case file index with new documents and prepare for inclusion into central files (.3); identify new pleading and include into the central file docket binders (1.3).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/08/01	Marguerite M Melvin	6.40	Obtain updated dockets for asbestos-related bankruptcy cases (1.5); review dockets for recently filed pleadings (1.0); download pleadings (1.5); prepare subfolders for pleadings and file (.7); update pleadings indices (.8); update list of key professionals (.4); update schedule of events chart (.5).
11/09/01	James W Kapp	0.60	Review pleadings and correspondence (.1); attend to issues re same (.3); review motion status chart and attend to issues re same (.1); review docket (.1).
11/09/01	Brigitte F Windley	3.30	Provide case pleadings for attorney review (1.9); review various case documents and assign central case file categories (1.1); forward committee counsel contact information to V. Johnson (.3).
11/09/01	Sabrina M Mitchell	1.40	Update the case file index with new documents and prepare for inclusion into central files (.3); identify new pleadings using the court's website and include in the central file docket binders (1.1).
11/12/01	Shirley A Pope	5.80	Review correspondence (2.8); review pleadings (1.8); organize legal research materials for inclusion in Grace main file (1.2).
11/12/01	Brigitte F Windley	1.90	Review various case documents and assign central file category.
11/12/01	Sabrina M Mitchell	2.90	Update the case file index with new documents and prepare for inclusion into central files (.6); identify new pleadings using the court's website and include in the central file docket binders (2.3).
11/12/01	Benjamin J Alke	7.00	Organize index of cases cited in the CMO reply brief (1.8); update Concordance database re new pleadings (1.4); update case file re new Legal Research documents, deposition transcripts, attorney working files, and claims/forms/database files (3.4); prepare copies of statistical analysis of 1997 and 2000 claims (.4).
11/13/01	Samuel A Schwartz	0.50	Telephone conferences with the client and local counsel re monthly operating reports and pending matters.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/13/01	Brigitte F Windley	1.20	Prepare various orders from central files for attorney review (.4); review various case documents and assign central file categories in preparation for central filing (.8).
11/13/01	Sabrina M Mitchell	4.30	Review Bilzin fee applications for billing information (.6); update the case file index with new documents and prepare for inclusion into central files (.6); identify new pleadings using the court's website and include in the central file docket binders (2.7); organize lease and real estate binders into central files (.4).
11/13/01	Benjamin J Alke	3.90	Update Concordance database re new pleadings (1.8); update Grace Case file re new Legal Research files and Scientific Articles cited in CMO reply brief (2.1).
11/14/01	Shirley A Pope	5.50	Review correspondence and update files (1.5); Westlaw project re opinions in Gypsum and Celotex cases (.8); prepare documents for attorney review (1.0); update reference files (1.2); update legal research files (1.0).
11/14/01	Samuel A Schwartz	0.60	Review docket (.4); review of the motion status chart (.2).
11/14/01	Brigitte F Windley	1.60	Review various case documents and assign central file categories (1.2); review motion status chart (.4).
11/14/01	Sabrina M Mitchell	2.40	Update the proof of claims spreadsheet (.3); update the case file index with new documents and prepare for inclusion into central files (.3); identify new pleadings using the court's website and include in the central file docket binders (1.6); review the online docket and update the motion status chart (.2).
11/14/01	Benjamin J Alke	6.50	Attend to matters re forwarding documents related to CMO reply brief to M. Peterson (.4); edit Concordance database re new pleadings (2.2); prepare copies of CMO reply brief, Exhibit K, and Rourke Affidavit to be forwarded to counsel (2.1); update Grace Case file with new legal research files (1.8).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/14/01	Marguerite M Melvin	2.20	Review DBR to locate articles of interest on the asbestos-related cases (.7); duplicate and distribute articles (1.0); locate and download dockets for related asbestos cases to locate recently filed pleadings of interest (.5).
11/15/01	David M Bernick, P.C.	1.50	Prepare for and attend team telephone conference.
11/15/01	Shirley A Pope	3.00	Review correspondence and file same (1.5); prepare projects re November 21 hearing (1.5).
11/15/01	Christopher B Sullivan	0.50	Prepare for and attend team meeting.
11/15/01	Kimberly K Love	3.00	Prepare and organize various precedent materials re estimation.
11/15/01	Brigitte F Windley	3.10	Prepare orders from central file for attorney review (.6); review and update motion status chart (.8); review various case documents and assign central file categories (1.7).
11/15/01	Benjamin J Alke	8.00	Prepare copies of Notice of Removal pleadings (1.4); prepare copies of pleadings re Prudential for attorney review (1.4); prepare data re claim payment. (5.2).
11/15/01	Marguerite M Melvin	3.50	Download recently filed asbestos bankruptcy case pleadings (2.0); prepare subfolders and file pleadings (.5); update indices, update the list of key professionals for each case (.5); update the schedule of events chart (.5).
11/16/01	Sabrina M Mitchell	1.30	Update the case file index with new documents and prepare for inclusion into central files (.3); identify new pleadings using the court's website and include in the central file docket binders (1.0).
11/16/01	Marguerite M Melvin	4.50	Download recently filed asbestos bankruptcy case pleadings (3.0); prepare subfolders and file pleadings (.5); update indices, update the list of key professionals for each case (.5); update the schedule of events chart (.5).
11/17/01	David M Bernick, P.C.	3.00	Prepare for and attend team meeting.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/17/01	Shirley A Pope	2.00	Prepare for and attend team meeting.
11/17/01	Benjamin J Alke	8.80	Prepare materials for November 21 hearing.
11/19/01	James W Kapp	0.20	Review docket (.1); attend to issues re same (.1).
11/19/01	Shirley A Pope	1.50	Review correspondence (.5); attend to matters re legal research to be included in main file (1.0).
11/19/01	Brigitte F Windley	2.30	Download motion to dismiss pleadings from court docket and distribute same for attorney review (.9); identify pleadings on docket for client (.8); review various case documents received and assign central file categories to same in preparation for central filing (.6).
11/19/01	Sabrina M Mitchell	0.90	Locate agreement/contracts in response to Dow Chemical document requests.
11/19/01	Sabrina M Mitchell	2.20	Search the online docket for the first claims settlement notice (.3); distribute the online docket to attorneys (.1); update the case file index with new documents and prepare for inclusion into central files (.2); identify new pleadings using the court's website and include in the central file docket binders (1.6).
11/19/01	Marguerite M Melvin	0.30	Review the Pittsburgh Coming docket and mark pleadings of interest to be ordered.
11/20/01	Emily J Knox	1.00	Prepare pleadings for attorney review.
11/20/01	Brigitte F Windley	0.90	Identify pleadings for client (.4); organize Electronic Case Filing registration with bankruptcy court (.5).
11/20/01	Sabrina M Mitchell	0.40	Collate agreements for Dow Chemical document request.
11/21/01	Andrew R Running	1.00	Attend to matters re hearing preparations (.5); attend to matters re cancellation of hearing and reassignment of the case to a new judge (.5).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/21/01	Brigitte F Windley	1.10	Review various case documents to assign central file category in preparation for central filing.
11/21/01	Roger J Higgins	1.30	Attend to matters re Dow Chemical document request (.5); telephone conference with A. Kelley re same (.3); research period of time allowed for reconsideration of first day motions (.5).
11/21/01	Sabrina M Mitchell	1.00	Retrieve the settlement procedures motion and transmit to B. Hatfield (.2); retrieve and transmit requested documents to B. Eller (.8).
11/21/01	Marguerite M Melvin	4.30	Obtain dockets from related bankruptcy cases (1.5); review dockets to locate and download pleadings of interest (1.8); update pleadings indices (.5); prepare subfolders for each pleading and file (.5).
11/24/01	Janet Baer	1.00	Review correspondence and pleadings on various outstanding matters.
11/26/01	James W Kapp	0.20	Telephone conference with D. Siegel re transfer of bankruptcy cases.
11/26/01	James W Kapp	0.10	Review articles re bankruptcy cases.
11/26/01	Shirley A Pope	8.00	Organize hearing materials for filing (2.0); review correspondence and file (1.5); organize legal research documents (2.0); review pleadings (.5); organize hearing transcripts (.5); organize deposition transcripts for filing (1.5).
11/26/01	Roger J Higgins	1.60	Telephone conference with D. Siegel re identifying committee members in major asbestos cases (.2); attend to matters re same (1.2); telephone conference with D. Carickhoff re same (.2).
11/26/01	Sabrina M Mitchell	2.40	Search asbestos case online dockets for committee members and counsel.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/26/01	Benjamin J Alke	7.50	Update Concordance database re new pleadings (2.4); update Grace case file re new transcripts (1.2); update Grace case file re new depositions (1.6); update Grace case file re new witness files (1.4); organize materials from 11/21 hearing and deliver to J. Baer (.9).
11/26/01	Marguerite M Melvin	4.50	Obtain dockets for relevant asbestos cases (1.0); review dockets to locate and download pleadings of interest (2.0); prepare subfolders for same and file (1.0); update indices (.5).
11/27/01	David M Bernick, P.C.	2.00	Attend team meeting and prepare for same (1.5); teleconference with D. Siegel re new judge (.5).
11/27/01	Michelle H Browdy	0.50	Prepare for and attend team meeting.
11/27/01	Mark E Grummer	0.50	Prepare for and participate in team telephone conference.
11/27/01	James W Kapp	1.60	Telephone conference with D. Carickhoff re transfer order (.2); review docket and attend to issues re same (.1); attend status meeting and attend to issues re same (1.3).
11/27/01	Scott A McMillin	1.00	Prepare for and attend litigation strategy meeting (.5); consider litigation strategy (.5).
11/27/01	Shirley A Pope	7.50	Review correspondence and file (1.0); update reference files (.8); prepare for and attend Grace team meeting (1.5); organize Grace document collection (1.2); update document indices (.5); prepare documents for attorney review (.5); update legal research re Grace main file (1.0); revise file indices (1.0).
11/27/01	Andrew R Running	0.90	Prepare for and participate in team meeting.
11/27/01	Kellye L Fabian	0.70	Prepare for and attend team meeting.
11/27/01	Deanna D Boll	1.30	Prepare for and attend team teleconference (.8); attend to matters re transfer of case (.5).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/27/01	Emily J Knox	3.80	Prepare and organize various precedent transfers pleadings and trial transcripts for attorney review.
11/27/01	Janet Baer	0.50	Attend to matters re case transfer order and scheduling issues related thereto.
11/27/01	Roger J Higgins	0.50	Collect information on creditors' committees, etc., for major asbestos cases.
11/27/01	Sabrina M Mitchell	3.80	Collect information on creditors' committees, etc., for other major asbestos cases. (1.3); create Excel chart re committee members and DIP lenders for precedent cases (1.6); prepare SOFA's for duplication by reprographics (.2); respond to document request by B. Eller (.4); duplicate and send media file to D. Boll (.1); retrieve and distribute wage motion and orders (.2).
11/27/01	Benjamin J Alke	2.00	Create binder of printouts of law reviews cited in CMO reply brief (.8); update Concordance database re new pleadings (1.2).
11/27/01	Marguerite M Melvin	1.90	Continue to search dockets to pull pleadings regarding a motion to dismiss the case (1.5); locate articles of interest (.2); copy and distribute same for attorney review (.2).
11/28/01	David M Bernick, P.C.	1.50	Prepare outline for status report (1.0); telephone conference with D. Siegel re new order (.5).
11/28/01	James W Kapp	0.10	Review articles pertaining to bankruptcy case.
11/28/01	James W Kapp	0.60	Review designation of District Judge and attend to issues re same and telephone conference with D. Siegel re same.
11/28/01	James W Kapp	0.40	Review correspondence and pleadings and attend to issues re same.
11/28/01	Shirley A Pope	0.50	Review correspondence and file.
11/28/01	Andrew R Running	0.20	Telephone conversation with D. Rourke re case status.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/28/01	Brigitte F Windley	3.40	Obtain and distribute of case transfer order for attorney review (1.2); review media reports and transmit same for attorney review (.8); transmit schedules for attorney review (.3); identify and prepare duplicates of pleadings for attorney review (1.1).
11/28/01	Sabrina M Mitchell	0.10	Prepare SOFA's for attorney review
11/28/01	Benjamin J Alke	2.00	File materials from Nov. 21 hearing (1.6); file Fresenius transaction documents (.4).
11/28/01	Marguerite M Melvin	2.40	Access Internet to obtain the Burns & Roe docket (.2); review same to look for Brief in support of Motion to Dismiss (.3); telephone call to Sills, Cummis to request copy of pleading not imaged (.2); forward pleading to D. Boll for review (.2); pull additional pleadings from the Burns & Roe and Raytech dockets for D. Boll (1.5).
11/29/01	David M Bernick, P.C.	2.50	Telephone conference with F. McGovern (.2); compile draft report to Judge Wolin re Grace (2.0); telephone conference with D. Siegel re Delaware developments (.3).
11/29/01	Shirley A Pope	5.50	Review correspondence and file (2.5); prepare documents requested by D. Rosenbloom (1.0); update media files (1.0); prepare documents for attorney review (1.0).
11/29/01	Kimberly K Love	2.00	Prepare and organize various materials, Fraudulent Transfers, Declaratory Judgment for attorney review.
11/29/01	Brigitte F Windley	2.90	Transmit case transfer order to various parties (.8); transmit case management brief to outside counsel (.7); review various case documents to assign central file categories to same in preparation for central filing (1.4).
11/29/01	Janet Baer	0.40	Review various correspondence re reassignment of case.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/29/01	Sabrina M Mitchell	5.80	Review the online docket and update the motion status chart (.6); retrieve and duplicate the debtors response to the case management motion (.2); identify new pleadings using the court's website and include in the central file docket binders (3.6); update the case file index with new documents and prepare for inclusion into central files (1.4).
11/29/01	Benjamin J Alke	5.80	Update Concordance with new pleadings (1.0); update Concordance database with transcript (.4); prepare copies of PD committee Sept. Reply brief and CMO Reply brief for attorney review (.8); organize client documents re Hi Temp Cement for attorney review (3.6).
11/29/01	Marguerite M Melvin	3.30	Review relevant dockets to locate Motion to Dismiss case, objections thereto and Order denying Motion and download pleadings for attorney review.
11/30/01	Shirley A Pope	3.50	Review correspondence and file same (.5); update reference files re fraudulent conveyance (1.0); review pleadings (.5); prepare documents for attorney review (1.5).
11/30/01	Kimberly K Love	1.00	Prepare precedent materials for attorney review.
11/30/01	Samuel A Schwartz	1.20	Review docket (.8); telephone conferences with local counsel re pending matters (.4).
11/30/01	Brigitte F Windley	2.50	Prepare case information for attorney review (.3); prepare CM/ECF application materials for attorney review (.5); review various case documents to assign central file categories in preparation for central filing (.7); prepare and transmit case pleadings to E. Post (1.0).
11/30/01	Janet Baer	0.50	Review various orders and letters on case assignments (.2); attend to matters re same (.3).
11/30/01	Sabrina M Mitchell	2.30	Update the case file index with new documents and prepare for inclusion into central files (.4); Identify new pleadings using the court's website and include in the central file docket binders (1.9).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/30/01	Benjamin J Alke	7.00	Prepare copies of Informational Brief and CMO Reply brief for attorney review (.6); file Barbanti deposition transcript and 11/21 hearing materials (.8); update concordance with new pleadings transferring case to Judge Wolin (1.8); prepare copy of PI Opposition to CMO and distribute (.6); organize client materials on Hi Temp Cement for attorney review (3.2).
11/30/01	Marguerite M Melvin	0.50	Copy and distribute articles of interest on asbestos cases for attorney review.

Matter 21 - Claim Estimate, Objection and Resolution - Fees

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/01/01	Sarah R Marmor	8.50	Work on CMO reply brief (7.5); attend to matters re same (1.0).
11/01/01	Deanna D Boll	4.00	Meet with KPMG and clients re claims management (2.3); analyze claims management proposals (.8); telephone conference with T. Behnke re same (.4); review Rust claims processing precedent re duties and responsibilities (.5).
11/02/01	David M Bernick, P.C.	2.00	Revise CMO reply brief.
11/02/01	James W Kapp	0.40	Address issues re potential administrative claims.
11/02/01	James W Kapp	0.60	Address issues re partial settlement of claims and prepare pleadings re same.
11/02/01	James W Kapp	0.80	Telephone conference with D. Siegel re response to case management order.
11/02/01	Sarah R Marmor	7.00	Revise CMO reply brief.
11/02/01	Deanna D Boll	1.00	Attend to claims management issues (.1); telephone conference with S. Darr at KPMG re claims management issues (.1); review CMO reply brief and exhibits (.8).
11/03/01	David M Bernick, P.C.	1.00	Revise CMO reply brief.
11/03/01	Sarah R Marmor	1.50	Review and edit new sections of CMO reply brief.
11/04/01	David M Bernick, P.C.	5.00	Revise CMO reply brief.
11/04/01	Sarah R Marmor	1.50	Review and edit new sections of CMO brief.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/05/01	David M Bernick, P.C.	2.50	Revise CMO reply brief.
11/05/01	James W Kapp	0.50	Conference with R . Raskin, K. Pasquale, D. Siegel and W. Sparks re case management order and issues re same.
11/05/01	Sarah R Marmor	7.00	Revise CMO reply brief (6.5); attend to matters re same (.5).
11/05/01	Andrew R Runing	1.70	Review latest draft of CMO reply brief (.9); attend to matters re revisions to same (.8).
11/05/01	Kellye L Fabian	1.50	Proofread CMO reply brief (.6); revise and edit class action section of reply brief (.9).
11/05/01	Deanna D Boll	0.50	Correspond with BMC and F. Zaremby re claims management meeting.
11/06/01	David M Bernick, P.C.	5.00	Revise CMO reply brief.
11/06/01	Sarah R Marmor	8.00	Revise CMO reply brief (7.5); attend to matters re same (.5).
11/06/01	Christopher B Sullivan	2.70	Review/edit CMO reply brief (2.0); review/edit order (.7).
11/06/01	Samuel A Schwartz	1.10	Telephone conferences with the client re various claims resolutions and related matters (.8); attend to Canadian Settlement issues (.3).
11/06/01	Deanna D Boll	0.30	Telephone conference with F. Zaremby re BMC (.2); contact BMC re office meeting (.1).
11/06/01	Janet Baer	0.30	Review revised Protein Genetics offer letter.
11/06/01	Janet Baer	1.00	Attend to matters re claims experts (.4); confer with K. Kinsella re hearing on CMO and draft story boards (.6).
11/07/01	David M Bernick, P.C.	3.50	Revise CMO reply brief.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/07/01	James W Kapp	0.40	Review claims settlement notice and attend to issues re same.
11/07/01	Sarah R Marmor	7.00	Review comments from client re CMO reply (1.0); follow up on responses and edits regarding same (1.5); revise CMO reply brief (4.5).
11/07/01	Andrew R Running	2.60	Attend to matters re revisions to CMO reply brief (.5); revise CMO reply brief (1.7); telephone conferences with J. Hughes re his comments on the brief (.4).
11/07/01	Christopher B Sullivan	1.20	Review and edit proposed case management order.
11/07/01	Samuel A Schwartz	3.80	Review and analyze the Canadian Settlements (1.8); draft the claims notice and claims summaries re same (1.7); attend to matters re same (.3).
11/07/01	Brigitte F Windley	0.20	Telephone conference with claims agent re distribution logistics.
11/07/01	Janet Baer	3.00	Attend to matters re same (.5); prepare status chart re same and transmittal on draft CMO order (.5); review final draft of CMO reply brief (2.0).
11/08/01	James W Kapp	0.40	Review Zapata and Privest settlement notices and attend to issues re same.
11/08/01	Andrew R Running	4.50	Attend to matters re CMO reply brief (.4); revise same (4.1).
11/08/01	Christopher B Sullivan	1.90	Draft/edit proposed case management order (1.7); attend to matters re same (.2).
11/08/01	Kimberly K Love	2.00	Prepare and organize various materials re Proof of Claim forms.
11/08/01	Kellye L Fabian	2.50	Proofread CMO reply brief.
11/08/01	Samuel A Schwartz	0.40	Revise the Canadian claims settlement notices (.2); telephone conferences with the client re same (.2).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/08/01	Deanna D Boll	3.50	Consider issues re T. Hilsee deposition (.5); review Hilsee affidavit and Kinsella revised plan (1.7); review Hilsee affidavit in B&W and Hilsee plan in B&W as comparison tool and notices in both cases (1.3).
11/08/01	Janet Baer	4.00	Confer with S. Baena and other parties re CMO discovery (.1); review and revise case management order and reply brief and confer with various parties re same (3.9).
11/09/01	David M Bernick, P.C.	4.50	Revise CMO reply brief.
11/09/01	Sarah R Marmor	7.00	Finalize and arrange filing of CMO reply brief.
11/09/01	Andrew R Running	4.60	Revise CMO reply brief (3.2); draft D. Rourke affidavit (.8); telephone conferences with D. Rourke re revisions to his affidavit (.6).
11/09/01	Deanna D Boll	5.70	Review background materials for T. Hilsee deposition and begin drafting outline for same (5.5); correspond with BMC re Boca Raton meeting (.2).
11/09/01	Janet Baer	2.50	Assemble documents for Hilsee deposition preparation re Barbanti (.5); coordinate discovery for case management hearing (1.0); confer with K. Kinsella re exhibits for hearing and related discovery issues (.5); coordinate transmittal of CMO reply brief and exhibits to PD Committee (.5).
11/09/01	Janet Baer	0.30	Review new claims settlement notice.
11/11/01	Janet Baer	6.00	Prepare Hilsee deposition notice and document request (.5); review Hilsee documents/pleadings to prepare outline for deposition (2.6); prepare outline for Hilsee deposition (2.4); review Hilsee outline and St. Johns pleadings (.5).
11/12/01	Samuel A Schwartz	0.60	Review and analyze the Canadian settlement summaries (.3); revise exhibit to the settlement notice (.2); attend to matters re same (.1).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/12/01	Deanna D Boll	7.00	Meet with BMC re claims management (2.5); analyze Barbanti hearing documents and Hilsee B&W related submissions re T. Hilsee deposition (4.5).
11/12/01	Janet Baer	6.80	Prepare letter re discovery (.5); review documents and prepare outline for Hilsee deposition and Kinsella testimony and deposition (5.3); confer with K. Kinsella re Hilsee depositions (1.0).
11/13/01	Shirley A Pope	1.00	Prepare claims documents re Babcock & Wilson, W.R. Grace and fax to F. McGovern.
11/13/01	Shirley A Pope	4.30	Review correspondence and update correspondence file (1.5); review pleadings (.5); forward Abner and Woodward complaints to W. Gallagher (.3); review legal research documents forwarded by Grace attorneys (1.0); update general reference re Grace main file (1.0).
11/13/01	Samuel A Schwartz	0.20	Telephone conferences with Lawson Lundell attorney re Canadian settlements.
11/13/01	Deanna D Boll	5.80	Prepare materials for T. Hilsee deposition.
11/13/01	Janet Baer	8.00	Consider issues and prepare for Hilsee deposition and Kinsella direct and cross (2.0); review Kinsella documents for production and confer with K. Kinsella re same (3.5); revise Hilsee deposition outline and materials (1.5); revise Kinsella direct examination outline and materials (1.0).
11/14/01	Samuel A Schwartz	2.00	Review and revise the Canadian settlement summaries (.5); telephone conferences with R. Haley and the client re same (.4); draft the notice of formation of the proof of claims PO Box (.6); draft correspondence with local counsel re same (.4); attend to matters re same (.1).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/14/01	Janet Baer	10.30	Attend to matters re coordination of depositions (.7); prepare correspondence re same (.5); revise and confirm arrangements for court reporter and conference room (.5); prepare letter re Hilton and Rabinovitz depositions (.3); review protective order and consider issues re same (.8); confer with K. Kinsella re story boards and testimony (.5); prepare objection to protective order consider issues re same (2.0); review Hilsee documents (1.0); prepare materials for Hilsee and Kinsella depositions (1.0); supplement Hilsee deposition outline (1.0); revise and supplement Kinsella deposition outline (1.0); prepare and revise charts for trial (1.0).
11/14/01	Janet Baer	1.00	Conference with S. Ahern re Protein Genetics, review document and participate in conference call re same.
11/14/01	Sabrina M Mitchell	0.30	Update the proof of claims spreadsheet.
11/15/01	Samuel A Schwartz	1.40	Revise Second Claims Notice (.4); draft the First Settlement Notice Certificate of No Objection (.5); telephone conferences with B. Hatfield (.3); and local counsel (.2) re same.
11/15/01	Brigitte F Windley	0.90	Review and categorize new proofs of claims.
11/15/01	Janet Baer	9.00	Review materials for T. Hilsee and K. Kinsella deposition and confer with K. Kinsella, M. Owens and J. Hughes re same.
11/16/01	Andrew R Running	0.30	Telephone conference with D. Rourke re asbestos trust claims forms.
11/16/01	Deanna D Boll	7.00	Assist with T. Hilsee and K. Kinsella depositions in Philadelphia.
11/16/01	Janet Baer	11.00	Review outline, notes and documents re Hilsee deposition (2.0); confer with J. Hughes and K. Kinsella re same and Kinsella deposition (2.0); conduct Hilsee deposition and defend Kinsella and confer with client re same (7.0).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/18/01	Janet Baer	8.30	Revise Kinsella testimony outline and exhibits (3.0); review materials and deposition transcripts (1.7); attend to matters re same (.6); prepare various materials and respond to inquiries re Hilsee cross examination (2.0); prepare proof of claim questions (1.0).
11/19/01	Janet Baer	3.00	Prepare outline for ZAI Proof of Claim.
11/20/01	James W Kapp	2.10	Review materials pertaining to case management order and objections re same (2.0); attend to issues re same (.1).
11/20/01	Janet Baer	2.50	Review Kinsella deposition transcript.
11/21/01	Samuel A Schwartz	1.20	Telephone conferences with A. Krieger re the Canadian settlements notice (.2); draft correspondence to A. Krieger and B. Hatfield re same (.6); telephone conferences with R. Davies re the MCNIC adversary proceeding (.2); draft correspondence re same (.2).
11/26/01	Samuel A Schwartz	0.20	Telephone conferences with the client re the Canadian settlement notice.
11/27/01	Janet Baer	0.50	Revise Protein Genetics settlement notice.
11/28/01	Janet Baer	0.50	Finalize Protein Genetics notice.
11/29/01	Samuel A Schwartz	0.70	Telephone conferences with the client re Inventory Asbestos Settlements (.4); attend to matters re same (.3).

Matter 22 - Contested Matters/Adversary Proceedings - Fees

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/01/01	Scott A McMillin	1.30	Review notes re T. Hayes interview (.8); analyze document review issues (.2); telephone conference with S. Vasser re fraudulent transfer issues (.2); consider issues re same (.1).
11/01/01	Janet Baer	0.30	Telephone conference with D. Biederman and W. Sparks re Ohio book litigation.
11/02/01	Scott A McMillin	5.30	Review Grace documents re Fresenius and Sealed Air transactions and draft summary re same (4.5); attend to matters re witness interviews (.5); prepare fraudulent transfer outlines for WLRK document review (.3).
11/02/01	Janet Baer	0.50	Prepare memo on CNA/Monokote products liability matter.
11/04/01	Michelle H Browdy	1.20	Review client documents.
11/05/01	Michelle H Browdy	1.50	Attend to fraudulent conveyance document review issues (.5); prepare for 11/6 and 11/ 7 witness interviews (1.0).
11/05/01	James W Kapp	3.00	Review complaint and related pleadings of American Real Estate Holdings and attend to same.
11/05/01	James W Kapp	0.30	Review CMGI's objection to American Real Estate pleadings and attend to issues re same.
11/05/01	Scott A McMillin	2.30	Attend to matters re Exxon motion for summary judgment (.3); prepare for fraudulent transfer document review at WLRK (1.4); prepare for interviews with L. Ellberger and S. Krouskos (.6).
11/05/01	Christopher B Sullivan	2.50	Prepare agenda for fact story development meeting with Reed Smith and W. Sparks.
11/05/01	Kellye L Fabian	1.00	Attend to matters re review of documents.
11/05/01	Janet Baer	0.40	Attend to matters re status of various contested matters.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/05/01	Roger J Higgins	0.50	Prepare for fraudulent conveyance document review.
11/06/01	Michelle H Browdy	7.60	Prepare for witness interviews on fraudulent conveyance allegations (4.2); witness interview and follow up (3.4).
11/06/01	Scott A McMillin	7.40	Prepare for and meet with L. Ellberger (5.7); attend to matters re same (.7); review SEC correspondence re Sealed Air deal (1.0).
11/06/01	Christopher B Sullivan	2.50	Draft outline for ZAI fact witness interviews.
11/07/01	Michelle H Browdy	1.20	Witness interview (1.0); attend to matters re same (.2).
11/07/01	James W Kapp	0.20	Telephone conference with D. Carickhoff re local procedures pertaining to disclosure of experts.
11/07/01	Scott A McMillin	2.60	Prepare for and meet with S. Krouskos re Fresenius transaction (1.4); attend to matters re fraudulent transfer claims (1.0); conferences with F. Zaremby re document production (.2).
11/07/01	Christopher B Sullivan	1.50	Draft outline for ZAI fact witness interviews.
11/07/01	Samuel A Schwartz	0.40	Attention to the resolution of the MCNIC adversary proceeding.
11/08/01	David M Bernick, P.C.	4.50	Conference with D. Siegel re Manville Trust developments.
11/08/01	James W Kapp	0.30	Attend to issues re adversary proceeding filed by T. Kane.
11/08/01	Christopher B Sullivan	2.50	Review case file and interview notes in preparation for ZAI fact witness interviews.
11/08/01	Janet Baer	0.30	Conference with M. Cohan re CNA/MK Fire proofing matters.
11/09/01	Michelle H Browdy	1.80	Work on updating factual development for fraudulent conveyance allegation outlines.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/09/01	James W Kapp	0.30	Telephone conference with D. Siegel re depository motion and Manville precedent.
11/09/01	Scott A McMillin	0.30	Prepare for WLRK document review.
11/09/01	Andrew R Running	0.90	Telephone interview of potential expert witness.
11/09/01	Christopher B Sullivan	4.00	Prepare outlines and documents for ZAI fact witness interviews (2.0); review draft notes of previous interviews (2.0).
11/11/01	Christopher B Sullivan	3.50	Prepare outline and review documents in preparation for ZAI fact witness interviews.
11/12/01	David M Bernick, P.C.	1.30	Coordination of discovery re PD experts (.8); conference with J. Warren re Celotex history (.5).
11/12/01	Michelle H Browdy	2.40	Update fact outline for fraudulent conveyance claims.
11/12/01	James W Kapp	0.40	Telephone conference with L. Davis Jones re designation of experts and attend to issues re same.
11/12/01	Scott A McMillin	2.30	Prepare for WLRK document review (1.2); revise opposition to Kane motion for summary judgment (.8); review witness interview memoranda (.3).
11/12/01	Christopher B Sullivan	11.30	Prepare outline for C. Woods interview (2.8); meet with client and Reed Smith re attic insulation investigation (1.0); interview C. Woods (6.5); follow up with client and Reed Smith re same (1.0).
11/12/01	Janet Baer	1.20	Attend to matters re expert discovery and related issues (.2); revise Notice of depositions (.5); review pleadings for witness for hearing (.5).
11/12/01	Roger J Higgins	2.00	Review and comment on Fresenius and Sealed Air fraudulent conveyance action outline.
11/13/01	Michelle H Browdy	3.30	Continue updating fact re fraudulent conveyance claims outlines and incorporating notes from interviews.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/13/01	Scott A McMillin	10.30	Review WLRK documents re Fresenius and Sealed Air transactions (8.0); prepare for WLRK document review and conferences re same (2.3).
11/13/01	Reed S Oslan	2.00	Study cases and consider litigation strategy.
11/13/01	Christopher B Sullivan	11.00	Prepare outline for interview of B. Blessington (2.0); interview B. Blessington (5.0); meet with Casner & Edwards re ZAI fact investigation and document review (1.5); prepare for interview of D. Deucker (1.0); interview of D. Deucker (1.5).
11/13/01	Roger J Higgins	9.50	Review and comment on fraudulent conveyance outline (1.5); document review of Wachtell case files re asbestos liability and fraudulent conveyance issues (8.0).
11/14/01	Michelle H Browdy	2.10	Review and analyze additional documents re asbestos reserve analysis in anticipation of fraudulent conveyance allegations.
11/14/01	James W Kapp	0.40	Review motion for protective order of Property Damage Committee and attend to issues re same.
11/14/01	Scott A McMillin	10.00	Review WLRK documents re Fresenius and Sealed Air transactions (9.5); attend to matters re same (.5).
11/14/01	Andrew R Running	3.60	Review correspondence with Property Damage Committee Counsel re discovery disputes (.3); telephone conference with J. Hughes re next day's expert interview (.3); consider issues re drafting of response to Property Damage Committee's motion for protective order (.8); revise draft protective order response (2.2).
11/14/01	Christopher B Sullivan	8.00	Meet with W. Sparks and Reed Smith re strategy/schedule going forward with vermiculite fact investigation (1.0); prepare for interview with M. Favorito (2.0); interview M. Favorito (2.0); interview L. Shapiro (1.0); interview B. Froelick (2.0).
11/14/01	Roger J Higgins	10.50	Document review of Wachtell case files re asbestos liability and fraudulent conveyance issues (10.0); attend to matters re same (.5).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/15/01	Michelle H Browdy	2.30	Draft memorandum re asbestos reserve analysis in anticipation of fraudulent conveyance claims.
11/15/01	Michelle H Browdy	0.20	Consider issues re documents reviewed and potential privilege claims re fraudulent conveyance.
11/15/01	Scott A McMillin	1.50	Review WLRK document and draft memorandum (1.0); review witness interview notes re fraudulent transfer claims (.5).
11/15/01	Kellye L Fabian	0.30	Prepare for client conference call re development of trial outline.
11/16/01	Shirley A Pope	1.50	Review correspondence and file same.
11/16/01	Kellye L Fabian	1.10	Telephone conference with R. Smith and W. Sparks re development of trial outline.
11/17/01	Christopher B Sullivan	1.00	Legal research re asbestos product defenses.
11/19/01	James W Kapp	0.10	Attend to issues re motion to reject bankruptcy case filed by Zonolite plaintiff.
11/19/01	Scott A McMillin	0.80	Draft memorandum re WLRK document review (.5); review memorandum re PW documents (.3).
11/19/01	Kellye L Fabian	1.50	Review ZAI claimants motion to dismiss bankruptcy proceeding.
11/19/01	Janet Baer	0.30	Conference with W. Sparks re J. Wolters and KDC issues
11/20/01	James W Kapp	3.60	Review motion of Zonolite plaintiffs to dismiss Chapter 11 bankruptcy case and accompanying pleadings and attend to issues re same (3.0); review Zonolite plaintiffs adversary complaint (.6).
11/20/01	Andrew R Running	5.00	Review the ZAI Claimants motion to dismiss and class action complaint (1.7); analyze cases and SEC filings cited by the Property Damage Committee (3.3).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/20/01	Christopher B Sullivan	2.70	Research in support of CMO hearing (1.0); draft letters to co-counsel re case outline (.2); review core ZAI witness files (1.5).
11/20/01	Christopher B Sullivan	3.00	Letters to co-counsel re case outline (.5); review core ZAI witness files (2.5).
11/20/01	Janet Baer	1.20	Review ZAI complaint and motion to dismiss bankruptcy case (.8); conference with W. Sparks and W. Corcoran re KDC stock and J. Wolter matter (.4).
11/21/01	Theodore L Freedman	2.00	Prepare response to motion to dismiss.
11/21/01	James W Kapp	1.80	Review case law re Zonolite plaintiffs' motion to dismiss bankruptcy case and attend to issues re same.
11/21/01	Andrew R Running	4.00	Review Rabinowitz and Hilton affidavits and exhibits filed by the Property Damage Committee (1.5); legal research re precedents cited in those affidavits (2.5).
11/22/01	Theodore L Freedman	1.00	Prepare response to motion to dismiss.
11/26/01	Theodore L Freedman	4.50	Prepare response to motion to dismiss.
11/26/01	James W Kapp	0.30	Attend to issue re adversary proceeding filed by MINIC Pipeline.
11/26/01	Scott A McMillin	0.40	Consider issues re defense of fraudulent transfer claims.
11/26/01	Deanna D Boll	3.50	Consider issues re motion to dismiss chapter 11 (.3); examine law re good faith requirement for filing (3.2).
11/26/01	Janet Baer	0.80	Conference with W. Sparks re various outstanding contested matters (.3); respond to various party inquiries on contested matters (.5).
11/27/01	David M Bernick, P.C.	0.50	Teleconference with T. Freedman re motion to dismiss.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/27/01	Theodore L Freedman	4.00	Prepare response to motion to dismiss.
11/27/01	James W Kapp	2.00	Review adversary complaint of MCNIC Pipeline and attend to issues re same (.2); develop strategy for response to adversary complaint (.3); review class complaint concerning Zonolite Attec Insulation and attend to issues re same (1.5).
11/27/01	Scott A McMillin	0.30	Update fraudulent transfer outlines.
11/27/01	Kellye L Fabian	3.30	Review ZAI class adversary complaint (1.1); research fraudulent transfer as adversary proceeding (1.2); research issues re proper adversary proceedings (1.0).
11/27/01	Deanna D Boll	4.80	Review motion to dismiss, SGL Carbon material re same, and Grace Informational Brief (4.6); telephone conference with co-counsel re hearing date (.2).
11/28/01	Michelle H Browdy	2.20	Prepare for meeting on asbestos analysis re fraudulent conveyance claims.
11/28/01	Theodore L Freedman	3.00	Prepare response to motion to dismiss.
11/28/01	James W Kapp	2.90	Review complaint of Zonolite Attic Insulation (1.6); relief and develop strategy re same and review caselaw re same (1.3).
11/28/01	Scott A McMillin	0.10	Prepare for meeting with D. Rourke.
11/28/01	Kellye L Fabian	2.50	Research proper adversary proceedings in order to respond to ZAI adversary proceeding.
11/28/01	Deanna D Boll	5.00	Analyze case law, asbestos case precedent, and consider issues re motion to dismiss chapter 11 case.
11/28/01	Janet Baer	0.50	Consider case transfer issues.
11/29/01	Theodore L Freedman	2.00	Prepare response to motion to dismiss.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
11/29/01	Scott A McMillin	1.50	Legal research re corporate officer liability re fraudulent transfer (1.0); conferences with S. Vasser and B. Wolff re fraudulent transfer claims (.5).
11/29/01	Andrew R Running	0.40	Conference with B. Alke re project to summarize production documents.
11/29/01	Christopher B Sullivan	1.70	Telephone conferences with R. Smith re witness files for ZAI interviews (.2); draft outlines for witness interviews (1.5).
11/29/01	Kellye L Fabian	2.00	Research proper adversary proceeding issues.
11/29/01	Deanna D Boll	3.80	Examine law and outline arguments for opposition to motion to dismiss chapter 11.
11/30/01	Theodore L Freedman	5.00	Prepare response to motion to dismiss.
11/30/01	Scott A McMillin	3.00	Legal research re corporate officer liability re fraudulent transfer (2.5); attend to matters re same (.3); prepare for witness interviews in Florida (.2).
11/30/01	Christopher B Sullivan	1.60	Attend to matters re creation of witness files (.2); review of ZAI interview notes (1.4).
11/30/01	Roger J Higgins	1.80	Legal research on adversary proceedings for reply to Zonolite Class Action Motion.